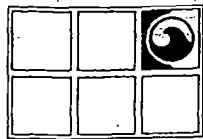




1013430

(mf:le / . 8.1.3)

**GROUNDWATER
TECHNOLOGY®**

Groundwater Technology, Inc.

637 Braddock Avenue, East Pittsburgh, PA 15112 USA
Tel: (412) 823-5300 Fax: (412) 824-7215

May 1, 1996

Dr. William R. Samples
Director - Environmental Control
Wheeling-Pittsburgh Steel Corporation
1134 Market Street
Wheeling, West Virginia 26003

RE: UST Remediation Project
Martins Ferry Plant
Martins Ferry, Ohio

Dear Dr. Samples:

I wanted to brief Wheeling-Pittsburgh Steel Corporation (WPSC) on potential issues associated with delays in obtaining approvals from the Ohio State Fire Marshal Bureau of Underground Storage Tank Regulations (BUSTR).

In June 1994, Groundwater Technology, Inc. (GTI) prepared and submitted a Remediation System Design/Corrective Action Plan (RSD/CAP) to BUSTR. The RSD/CAP was prepared to address dissolved- and liquid-phase petroleum hydrocarbons present in two water bearing zones beneath the site. The primary issues with these petroleum hydrocarbons is their close proximity and potential effect to the Martins Ferry municipal water wells. After approximately eight months of review, BUSTR responded to the RSD/CAP with concerns and comments in a letter to WPSC dated February 9, 1995. GTI, on behalf of WPSC, made modifications to the design and submitted a revised RSD/CAP to WPSC. WPSC submitted the revised RSD/CAP to BUSTR on May 3, 1995. Also submitted to BUSTR on May 3, 1995 was a "Project Status Report", which included recommended locations for two "point-of-compliance" wells required by BUSTR.

It has now been approximately one year since WPSC submitted the revised RSD/CAP to BUSTR. Since submittal of these documents, GTI and WPSC have not been contacted by BUSTR regarding these submittals nor has BUSTR communicated approval/concurrence with the revised RSD/CAP and the recommended "point-of-compliance" well locations.

If continued delays in obtaining approval from BUSTR are encountered, there is a continued risk that petroleum hydrocarbons may migrate to areas not addressed by the revised RSD/CAP. In addition, the recommended locations for the "point-of-compliance" wells may become invalid if the petroleum hydrocarbons migrate beyond those locations.

Based on requirements specified by BUSTR in their last correspondence (February 9, 1995), GTI (on behalf of WPSC) has continued monthly monitor well gauging and free product bailing. Reports have been submitted to WPSC on a quarterly basis.

P:\STAFF\PSHAW\WPSC\96-04-30.WRS

Dr. William R. Samples

May 1, 1996

Page 2

To minimize further delay to this project, GTI suggests that a meeting be arranged between WPSC, BUSTR and GTI to discuss the revised RSD/CAP.

I've attached a summary of the major project milestones for your review. If you should you have any questions regarding this project, please do not hesitate to call me at (412) 823-5300.

Sincerely,

GROUNDWATER TECHNOLOGY, INC.



Bruce A. Shaw, P.G.

Project Manager

cc: Mr. David DiGiulio, Wheeling-Pittsburgh Steel Corp., 1134 Market St., Wheeling, WV 26003
Mr. Thomas Webster, Wheeling-Pittsburgh Steel Corp., 219 Public Road, Yorkville, Ohio 43971
W. Harris, Groundwater Technology, Inc.
S. McGuire, Groundwater Technology, Inc.
04003-0442.03

HISTORICAL SUMMARY OF MAJOR PROJECT MILESTONES

- April 1992 - GTI retained to perform an underground storage tank (UST) investigation to determine a remediation plan.
- April 1993 - GTI submitted "Conceptual Remediation System Design and Corrective Action Plan".
- January 1994 - Meeting between BUSTR, WPSC and GTI held to discuss the Conceptual Remediation System Design and Corrective Action Plan.
- March 1994 - WPSC received letter from BUSTR documenting January 1994 meeting, requesting submittal of a detailed corrective action plan by April 30, 1994, and requesting clarification/response to several concerns.
- April 1994 - GTI submitted letter to BUSTR addressing concerns described in their March 1994 letter to WPSC.

GTI submitted proposal to WPSC for preparation of "Remediation System Design/Corrective Action Plan".

- May 1994 - GTI received purchase order from WPSC to prepare "Remediation System Design/Corrective Action Plan".

GTI requested and obtained extension from BUSTR for extension of submittal of detailed corrective action plan.

GTI submitted proposal to WPSC for "Supplemental Environmental Consulting Services" to address BUSTR's concerns described in their March 1994 letter to WPSC.

- June 1994 - GTI submitted "Remediation System Design/Corrective Action Plan" to BUSTR and WPSC.
- July 1994 - GTI received change order from WPSC to perform "Supplemental Environmental Consulting Services".

GTI implemented tasks associated with "Supplemental Environmental Consulting Services", including a monitor well gauging and bailing program.

- September 1994 - GTI requested change order for groundwater sampling to complete modeling task of "Supplemental Environmental Consulting Services".

GTI submitted "Interim Report" describing the status of tasks initiated under the "Supplemental Environmental Consulting Services".

- December 1994 - GTI submitted revised cost estimate for groundwater sampling to complete modeling task of "Supplemental Environmental Consulting Services".



Telephone meeting between BUSTR, WPSC and GTI held to discuss BUSTR's comments/concerns based on BUSTR's partial review of the "Remediation System Design/Corrective Action Plan". BUSTR to complete review and prepare letter outlining concerns.

GTI received purchase order for groundwater sampling to complete modeling task of "Supplemental Environmental Consulting Services".

- February 1995 - WPSC received letter from BUSTR outlining comments/concerns with "Remediation System Design/Corrective Action Plan" and the status of tasks associated with the "Supplemental Environmental Consulting Services".
- March 1995 - Meeting between WPSC and GTI held to discuss February 1995 letter from BUSTR.

GTI submitted letter to WPSC in response to February 1995 letter from BUSTR.

- April 1995 - GTI submitted "Project Update Report" to WPSC describing the results of tasks completed under the "Supplemental Environmental Consulting Services", the monitor well gauging and bailing program, groundwater modeling, and recommended locations (contingent on BUSTR's approval/concurrence) for two additional "point-of-compliance" monitor wells.

GTI submitted following documents to WPSC:

- "Revised Remediation System Design/Corrective Action Plan";
- "Cost Estimate for Remediation System Installation Management and Remediation System Operation";
- "Cost Estimate for Remediation System Installation Management and Remediation System Operation";
- "Budgetary Cost Estimate to Install and Operate Remediation System"; and
- "Draft - Specification for Installation of Soil Vapor Extraction and Air Sparge Systems" (Bid Document).
- May 1995 - WPSC submitted following documents to BUSTR:
 - GTI response letter to BUSTR's February 1995 letter;
 - "Project Update Report"; and
 - "Revised Remediation System Design/Corrective Action Plan".

GTI submitted "Revised Cost Estimate for Remediation System Installation Management and Remediation System Operation"

Dr. William R. Samples

May 1, 1996

Attachment Page 3

- July 1995 through January 1996 - GTI submitted cost estimates and received purchase orders and change orders (on a quarterly basis) to continue monthly monitor well gauging and bailing, and reporting activities. Quarterly reports submitted to WPSC after completion of each quarter.
- October 1995 - GTI submitted "Detailed Cost Estimate for Remediation System Installation and Operation and Maintenance" to WPSC in response to letter received by WPSC from the Petroleum Underground Storage Tank Release Compensation Board.
- April 1996 - submitted cost estimate to WPSC to continue monthly monitor well gauging and bailing, and reporting activities through Quarter 2, 1996.